



A Division of Marmac Corporation

McDONOUGH MARINE SERVICE

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October 27, 2003

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590-0001

RE: Mandatory Ballast Water
Management Program for U.S. Waters
Docket Number (USCG-2003-14273) -41

2003 NOV -3 P 2:48
U.S. DEPT. OF TRANSPORTATION
DOCKETS

Dear Sir or Madam:

Thank you for the opportunity to offer our comments regarding the Mandatory Ballast Water Management Program for U.S. Waters, Docket Number USCG-2003-14273. Our company, McDonough Marine Service is primarily engaged in bareboat chartering barges to various segments of the marine community along the Gulf Coast, East Coast and the Inland River System of the United States. Our fleet is comprised of inland deck and ocean certified deck barges, inland hopper barges and inland U.S.C.G. certified Non-Hazardous Oilfield Waste barges, with the majority of the fleet being deck barges.

We are concerned with the current proposed regulations as they might apply to our fleet of barges, particularly since we, as owners, are faced with areas of compliance that we cannot practically address. Charterers of our vessels may be able to handle the reporting requirements of the regulations, but should they not, our inability to do so appears to still expose us to the criminal provisions therein.

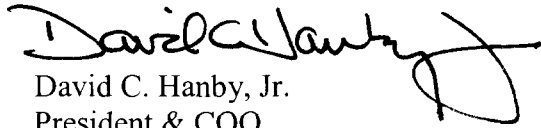
Also, should the regulations maintain the definition of ballast compartments to include any void tank capable of holding ballast water, the number of reports that may be generated will be vastly above those projected in the proposal. Our bareboat charters vary in term from a few days to a few weeks to years. The number of individual charters that occur during a year for each barge can be very high, with each charter making voyages that qualify as reportable under the current scenario.

"The Barge People"

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We concur with and endorse the comments which have been offered by the American Waterways Operators and urge you to consider modification of the regulations to allow the tug and barge industry a more reasonable opportunity to comply with the intent of Congress.

Very sincerely,



David C. Hanby, Jr.
President & COO